

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of Annual Assessment of the Status of)
Annual Assessment of the Status of Annual Assessment) MB Docket No. 12-203
of the Status of Delivery of Video Programming)

**COMMENTS OF
Access Tucson Community Media**

Access Tucson Community Media submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

History

Established in 1983, Access Tucson, an independent non-profit organization began operations in 1984. Access Tucson continues to successfully fulfill its mission by providing the community with the opportunity to express their ideas, perspectives, diversity, and knowledge through the use of electronic media. Access Tucson Community Media is distributed through Tucson’s cable systems on Cox channel 20--serving the city limits and Comcast channel 74--serving the greater county of Pima.

Channel Capacity and Accessibility

In 2006, Access Tucson Community Media and the education and government channels, lost a battle at the state level. Cable legislation, HR 2812, passed by the Arizona Legislature on March 1, 2006 was a bill containing terrible ambiguity that has harmed many cities and towns in Arizona. This bill is not a consumer friendly bill nor does it provide rate relief.

Access Tucson Community Media fought hard to retain its channel placement on the most basic, analog tier of the cable system. This resulted in the displacement of the educational channel on both the city limits cable provider (Cox) and the county cable system (Comcast). These systems combined represent over 220,000 subscribers. Providing a single additional basic tier channel could have resolved this issue. The cable operator, citing the legislation to take effect with the new 2012 license agreement, denied this request and solution.

In July of this year the mandated changes went into effect. Access Tucson Community Media was forced to reduce its community programming capacity from 3 channels to 1. This resulted in the displacement of some community programming to overnight hours for viewing, decreased the capacity for the distribution of national programming from independent sources and stunted the available live, interactive program opportunities for local contributors.

The City of Tucson budget cuts in 2009/10 reduced the capacity of service for Access Tucson Community Media by 75%. Operating hours and additional services for groups and organizations have been drastically reduced.

Access Tucson Community Media has continued to provide the education, tools and distribution necessary to support local dialog. To bring media communications resources and education to the community means keeping up with the evolution of technology. Cable providers are profiting as internet service providers. The support for on-line resources and education is needed within Community Media Centers to bridge the gaps between those able to take part in the 21st century flow of information and those left out of the equation by means or availability.

Access Tucson Community Media is investing in providing the tools and education to create a mediate literate, employable base in our community. We ask that the FCC recognize the incredible and real value that Community Media Centers across the country provide directly to their citizen. For a fraction of the PEG franchise fees, CMC's everywhere support media literacy for youth and adults, support community dialog, provide local and hyper-local programming and information and provide valuable technology training for community members.

Respectfully,

Lisa Horner
Director

Access Tucson
Community Media

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